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February 8, 2006

National Credit Union Administration  
Mary Rupp, Secretary of the Board  
1775 Duke Street  
Alexandria, VA 22314-3428

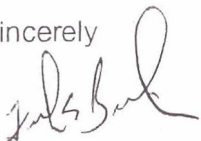
RE: Proposed Guidance: Nontraditional Mortgage Products 06-EA-04

Dear Ms. Rupp:

We have reviewed the summary of NCUA's proposed guidance, Nontraditional Mortgage Products and our comments are as follows:

1. Our credit union does offer nontraditional mortgage products, such as HLPR (Home Loan Payment Relief Program) for the first time homebuyer, 40 year fixed, and income properties.
2. We do not believe that lenders should analyze each borrower's capacity to repay the loan under comprehensive debt service qualification standards that assume the borrower makes only minimum payments. This might eliminate many borrowers from such loans when reality is that high interest rate increases might normally result in prepayment through refinance.
3. We feel that reduced documentation should be available for well-qualified borrowers.
4. No, we do not suggest any other forms of reduced documentation that would be appropriate in underwriting nontraditional mortgage loans.
5. No, we do not believe that reduced documentation would be appropriate for sub-prime borrowers.
6. Yes, in our opinion, future income should be considered in the qualification standards for nontraditional mortgage loans with deferred principal and/or interest payments. If tied to known increases that can be documented (i.e. future pension payments, etc.)
7. No, we do not suggest any other potential events (e.g. increases in interest rates for ARM products) that should be considered in qualification standards for nontraditional mortgage loans.

Sincerely



Frank E. Berrish  
President/CEO

